

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF CONNECTICUT
BRIDGEPORT DIVISION**

| | | |
|--|---|----------------------|
| In re | : | Chapter 11 |
| | : | |
| O.W. Bunker Holding North America Inc., <i>et al.</i> , ¹ | : | Case No. 14-51720 |
| | : | |
| Debtors. | : | Jointly Administered |
| | : | |

**DEBTORS' REQUEST TO MODIFY THE FIRST AMENDED SCHEDULING ORDER
[DOCKET NO. 781] WITH RESPECT TO CERTAIN DEADLINES**

O.W. Bunker Holding North America Inc. ("OWB Holding"), O.W. Bunker North America Inc. ("OWB NA"), and O.W. Bunker USA Inc. ("OWB USA"), debtors and debtors in possession in the above-captioned cases (collectively, the "Debtors") hereby request an extension of certain deadlines in the First Amended Scheduling Order [Docket No. 781]. In further support, the Debtors, by and through their undersigned counsel, respectfully state as follows:

BACKGROUND

1. On August 7, 2015, the Court entered its First Amended Scheduling Order (the "Scheduling Order"). The Scheduling Order provided that "[t]his Scheduling Order may be modified or extended by further Order of the Court or request by the Debtors." Scheduling Order ¶9. The Debtors, with the consent of the Committee, ING Bank, and NuStar, request the following modifications of the Scheduling Order:

- a. Paragraph 2 should be modified to provide that the Chapter 11 Plan be filed on September 21, 2015 (prior date was September 15, 2015).

¹ The last four digits of the Debtors' taxpayer identification numbers follow in parentheses: O.W. Bunker Holding North America Inc. (7474), O.W. Bunker North America Inc. (7158), and O.W. Bunker USA Inc. (3556). The Debtors' address is 281 Tresser Blvd., 2 Stamford Plaza, 15th Floor, Stamford, CT 06901.

- b. Paragraph 3 is modified to provide objections to the Disclosure Statement be received on or before 4:00 p.m. on October 6, 2015 (prior date was September 30, 2015).
- c. Paragraph 4 is modified to provide for a Disclosure Statement hearing on October 13, 2015, or such other date during that week that the Court orders (prior date was October 6, 2015).

2. Based on the requested modifications, the Debtors seek a concomitant extension of their exclusive right to file a chapter 11 plan to September 21, 2015 (currently set to expire on September 15, 2015). The Committee, ING Bank and NuStar consent to the extension of exclusivity.

3. The requested modifications are included in the form of order attached hereto as Exhibit A.

NOTICE

4. Notice of this Motion will be given to (a) the United States Trustee for the District of Connecticut; (b) counsel to the Committee; (c) counsel to ING Bank; (d) counsel to NuStar; and (e) all parties in interest requesting notice in the Chapter 11 Cases pursuant to Bankruptcy Rule 2002. The Debtors submit that no other or further notice is required under the circumstances.

Dated: Hartford, Connecticut
September 14, 2015

Respectfully submitted,

/s/ Michael R. Enright
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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF CONNECTICUT
BRIDGEPORT DIVISION**

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|--|---|--|
| <p>In re</p> <p>O.W. Bunker Holding North America Inc., <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p> | <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> | <p>Chapter 11</p> <p>Case No. 14-51720</p> <p>Jointly Administered</p> |
|--|---|--|

**ORDER GRANTING THE DEBTORS' REQUEST TO MODIFY CERTAIN
DEADLINES IN THE FIRST AMENDED SCHEDULING ORDER**

This matter coming before the Court on the *Debtors' Request to Modify the First Amended Scheduling Order [Docket No. 781] With Respect to Certain Deadlines* (the "Request");² the Court having reviewed the Request; the Court finding that (a) it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this is a core matter pursuant to 28 U.S.C. § 157(b)(2)(A); and (c) notice of the Request was sufficient under the circumstances; the Court having determined that the legal and factual bases set forth in the Request establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor:

IT IS HEREBY ORDERED THAT:

1. The Request is GRANTED
2. The First Amended Scheduling Order [Docket No. 781], is modified as follows:

¹ The last four digits of the Debtors' taxpayer identification numbers follow in parentheses: O.W. Bunker Holding North America Inc. (7474), O.W. Bunker North America Inc. (7158), and O.W. Bunker USA Inc. (3556). The Debtors' address is 281 Tresser Blvd., 2 Stamford Plaza, 15th Floor, Stamford, CT 06901.

² Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Request.

- a. Paragraph 2 is modified to provide that the Debtors' Chapter 11 Plan be filed on September 21, 2015.
- b. Paragraph 3 is modified to provide objections to the Disclosure Statement be received on or before 4:00 p.m. on October 6, 2015.
- c. Paragraph 4 is modified to provide for a Disclosure Statement hearing on October 13, 2015, or such other date during that week that the Court orders.

3. The Debtors' exclusive period to file the Chapter 11 Plan is EXTENDED concomitantly to September 21, 2015.

4. The Bankruptcy Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

Dated: _____

Hon. Alan H.W. Shiff
United States Bankruptcy Judge

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF CONNECTICUT
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| Debtors. | : | Jointly Administered |
| | : | |

CERTIFICATE OF SERVICE

I, Michael R. Enright, certify that on September 14, 2015, I caused a copy of the *Debtors' Request to Modify the First Amended Scheduling Order [Docket No. 781] With Respect To Certain Deadlines* to be served on all parties who have electronically entered a notice of appearance through the notice of filing generated by the Court's Case Management/Electronic Case File ("CM/ECF") system.

Dated: Hartford, Connecticut
September 14, 2015

/s/ Michael R. Enright
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